## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

December 9, 2005

**TO:** J. Kent Fortenberry, Technical Director

**FROM:** R. Todd Davis/Donald Owen, Oak Ridge Site Representatives

**SUBJECT:** Activity Report for Week Ending December 9, 2005

A. <u>Building 9212 Documented Safety Analysis</u>. This week, staff members Bamdad, Duncan, Elliot, March and Raabe and the site reps. reviewed the status and content of the Building 9212 complex Documented Safety Analysis (DSA). Building 9212 is the last nuclear facility at Y-12 to implement a DSA in accordance with 10 CFR 830. BWXT submitted the latest revision of the safety analysis to YSO in late-November and YSO plans to complete their Safety Evaluation Report (SER) in February 2006. BWXT is currently developing the plans and schedule for DSA implementation. The contractor Implementation Validation Review is scheduled to begin in June 2006.

The BWXT safety analysis submitted to YSO proposes reclassification of one of the building sprinkler systems from safety class to safety significant based on the consequences of a large facility fire. YSO is evaluating this change as a part of their SER review. To support assumptions in the safety analysis (including the large fire analysis), BWXT has identified the need for Specific Administrative Controls for material-at-risk located within the facility. Details on the implementation of these controls have not been completed. The staff and site reps. continue to review the Building 9212 safety analysis and associated identification of controls.

- B. <u>Building 9212 Seismic Deficiencies</u>. As part of the proposed initial phase for seismic upgrades, BWXT has identified 54 components that require repair (e.g., missing or loose bolts, seismic straps). Work packages are currently being developed and BWXT plans to complete these repairs by May 2006. In addition, installation of a seismic cut-off valve for a natural gas line is scheduled for this month. The C-1 Wing Mezzanine and Building 9818 upgrades are scheduled to be complete by December 2006. NNSA plans to respond to the Board's November 28<sup>th</sup> letter on this subject after the risk prioritization of additional upgrades is complete in April 2006.
- C. <u>Rolling and Forming Operations</u>. Enriched uranium metal rolling and forming operations are being planned for later this month in the Machining building. YSO personnel noted to the site reps. that these operations have not been conducted since summer 2004. While BWXT identified restart of the salt bath following equipment replacement in the current BWXT Startup Notification Report, identification of restart of the entire rolling and forming operation was not addressed and no readiness review is planned by BWXT. YSO personnel have requested that BWXT address the justification for not performing a readiness review for this restart.
- D. Activity-Level Work Planning. As previously reported, hydrogen fluoride (HF) testing had been completed in the Oxide Conversion Facility. On Wednesday, facility shift management had granted work start approval to maintenance personnel to replace a rupture disk in the HF system. Personnel protective equipment (PPE) for the job had been determined during the pre-job briefing to not require supplied air respirator and protective garments. The maintenance personnel were at the job site and about to start the activity when an industrial safety representative noted that supplied air is required for such a system breach and had the job stopped. On Thursday, no critique had been called and the site rep. inquired with BWXT maintenance management on any work planning/control issues. Subsequently, BWXT maintenance management called a critique and determined that supplied air was expected but that the Job Hazard Analyses and work instructions were not clear on the required level of PPE. BWXT development of corrective actions continues.